

October 27, 2009

Congressional Committees

*Subject: Military Training: DOD's Report on the Sustainability of Training Ranges Addresses Most of the Congressional Reporting Requirements and Continues to Improve with Each Annual Update*

A fundamental principle of military readiness is that the military must train as it intends to fight. Military training ranges provide the primary means to accomplish this goal. The Department of Defense's (DOD) training ranges vary in size from a few acres, for small arms training, to over a million acres for large maneuver exercises and weapons testing, and include broad open ocean areas for offshore training and testing. New advances in military technology, coupled with the complexity of recent military operations in Iraq, Afghanistan, and other locations around the world, generate the need to continually update and maintain DOD's training ranges. Senior DOD and military service officials have reported for some time that they face increasing difficulties in carrying out realistic training at military installations due to outside influences. DOD has defined a number of factors—including competition for broadcast frequencies or airspace, air pollution, noise pollution, endangered species, critical habitats and other protected resources, unexploded ordnance and munitions, urban growth around installations, and civilian access—that it says encroach upon its training ranges and capabilities.

Because the military faces obstacles in acquiring new training lands, the preservation and sustainment of its current lands is a priority. Sustainable training range management focuses on practices that allow the military to manage its ranges in a way that ensures their usefulness well into the future. As required by section 366(a) of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 (as amended),<sup>1</sup> DOD was to submit a comprehensive plan for using existing authorities available to the department to address training constraints caused by limitations on the use of worldwide military lands, marine areas, and airspace to Congress in fiscal year 2004 with annual progress reports beginning in fiscal year 2005 and extending through 2013. As part of the preparation of this plan, the Secretary of Defense was to conduct an assessment of current and future training range requirements and an evaluation of the adequacy of DOD's current range resources to meet those requirements. The plan was also to include: proposals to enhance training range capabilities and address any shortfalls in resources identified pursuant to that assessment and evaluation; goals and milestones for tracking planned actions and measuring progress; projected funding requirements to implement planned actions; and a designation of an office in the Office of the Secretary of Defense and in each of the military departments responsible for overseeing implementation of the plan. Section 366(a)(5) requires that DOD's annual reports describe the department's progress in implementing its comprehensive plan and any actions taken or to be taken to address training constraints caused by limitations on the use of military lands, marine areas,

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<sup>1</sup> Pub. L. No. 107-314 (2002). Section 366 originally required reports for fiscal years 2005 through 2008. However, this requirement was extended through 2013 by section 348 of the John Warner National Defense Authorization Act for Fiscal Year 2007, Pub. L. No. 109-364 (2006). Additionally, section 1063(c)(2) of Pub. L. No. 110-181 (2008) made a clerical amendment to section 348 of Pub. L. No. 109-364.

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and airspace. Section 366(b) required DOD to submit a report to Congress on its plans to improve its readiness reporting system to reflect the readiness impact of certain training constraints. Section 366(c) also required DOD to develop and maintain a training range inventory to be submitted with the President's budget for fiscal year 2004 and annual updates for 2005 through 2013. Section 366(d) further required that we evaluate the plans submitted pursuant to subsections 366(a) and (b), and to submit our annual evaluations of DOD's reports to Congress within 90 days<sup>2</sup> of receiving these reports from DOD. Enclosure I contains the full text of section 366 of the National Defense Authorization Act for Fiscal Year 2003 (as amended).

This is our sixth review in response to this mandate. Although our prior reviews have disclosed that DOD had not addressed various elements of section 366 which it was required to include in its 2004 comprehensive plan, we have also noted that DOD has improved its report submissions over time and has taken action on various GAO recommendations. (Enclosure II provides a list of our prior recommendations and DOD actions in response to those recommendations). This report discusses (1) DOD's progress to date to address the elements of section 366 and (2) improvements incorporated in DOD's 2009 annual sustainable ranges report as well as DOD's plans for its 2010 report submission. In accordance with the mandate, we are submitting this report to you within 90 days after having received DOD's 2009 sustainable ranges report on August 3, 2009.

## **Scope and Methodology**

To better understand the basis of the annual sustainable ranges reporting requirement, we attended DOD's second biannual sustainable ranges conference in Phoenix, Arizona in August 2009 where we met with military training officials and discussed encroachment issues currently facing military training ranges and some of the lessons learned in mitigating resulting range capability shortfalls affecting training and readiness. To determine the extent to which DOD had addressed the elements of section 366 that were required to be included in its 2004 comprehensive plan, we summarized our work to date, including prior findings and recommendations and DOD's progress to address these elements over time. We also reviewed the extent to which DOD's sustainable ranges report has addressed the elements of subsection 366(a)(5). Although we were not required by section 366 to review DOD's training range inventory which is included in the ranges report, we elected to do so, as we have done in past years, due to the inventory's importance to the comprehensive training ranges plan. To determine what improvements DOD has made, as reflected in its 2009 report, and its plans for the next submission to Congress in 2010, we compared the 2009 report to the 2008 report and discussed key revisions with DOD officials involved with preparing these reports. We also discussed with Office of the Secretary of Defense (OSD) officials their plans and key initiatives for the 2010 report submission and reviewed the data request that they sent to the military services in June 2009 requesting information for the 2010 report. We further discussed with these and other military service officials key initiatives they are undertaking or have planned for improving the utility of the report, including plans for improving DOD's readiness reporting system to reflect the readiness impact of any training constraints associated with its training ranges.

We conducted this performance audit from August 2009 through October 2009 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>2</sup> This requirement was extended from 60 days to 90 days by section 348 of Pub. L. No. 109-364 (2006).

## Summary

Since 2004, DOD has shown progress in addressing the elements included in section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003, including the development of an inventory of military training ranges. DOD's 2009 sustainable ranges report and inventory are responsive to the element of 366 that requires DOD to describe the progress made in implementing its sustainable ranges plan and any additional action taken, or to be taken, to address training constraints caused by limitations on the use of military lands, marine areas, and airspace. DOD has also made progress in addressing elements of section 366 that were required as part of DOD's 2004 reporting requirements. For example, DOD has made strides to measure and report the impact that training constraints may have on readiness by developing approaches to incorporate ranges into DOD's readiness reporting system. As part of its comprehensive plan to address training constraints caused by limitations on its ranges, DOD has also developed and included in the 2009 report broad goals for this effort and has begun to include annual estimates of the funding required to meet these goals. However, while DOD has formulated some goals and milestones for tracking planned actions and measuring progress, as it was required to do as part of its 2004 comprehensive plan, it has yet to develop quantifiable goals, which we have previously recommended to better track planned actions and measure progress for implementing planned actions.<sup>3</sup> Without quantifiable goals and time frames associated with achieving milestones, it is difficult to measure and track the extent of progress actually made over time. In addition, while DOD has included some projected funding data, as it was required to do as part of its 2004 comprehensive plan, DOD has not yet included projected funding requirements that will be needed to implement its planned actions, as we also recommended previously, so that decision makers have better information available to make budget decisions. In order to better track its progress to address training constraints caused by limitations on its ranges, we reiterate our prior recommendation that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to provide a more complete plan to Congress that includes (1) quantifiable goals and milestones for tracking planned actions and measuring progress and (2) projected funding requirements to more fully address identified training constraints.<sup>4</sup>

DOD has made several improvements to its most recent 2009 report and plans "revolutionary changes" for 2010. For example, DOD has included detailed capability and encroachment data provided and used by the military services when making their capability assessments for each training range surveyed. DOD officials told us that they expect these data to provide improved information for more precise planning in the future. DOD also added a special interest section to highlight key issues affecting range capability and some of the actions taken to mitigate negative impacts, which should provide congressional decision makers and other users with a better understanding of the approaches being used to improve the capabilities of DOD's ranges. Moreover, DOD has already begun to develop its 2010 report, which DOD officials told us they expect to issue in early 2010. DOD officials have stated that they intend to introduce "revolutionary changes" in that upcoming report, including revamping their goals and increasing the focus on specific encroachment issues such as mitigating frequency spectrum competition, managing increased military demand for range space, and meeting military airspace challenges.

In commenting on a draft of this report, DOD agreed with our findings and provided technical comments, which we have incorporated in this report as appropriate.

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<sup>3</sup> GAO, *Military Training: DOD Report on Training Ranges Does Not Fully Address Congressional Reporting Requirements*, GAO-04-608 (Washington, D.C.: June 4, 2004).

<sup>4</sup> GAO-04-608.

## **DOD Has Addressed Most of the Provisions of Section 366, but Can Improve Sustainable Range Reporting**

Although DOD has now addressed most of the elements of section 366 requirements, its annual report could be further improved. DOD's 2009 report provides an update on the continued progress being made in implementing the range sustainment plan and any additional actions it has taken or plans to take to address training constraints caused by limitations on the use of military lands, marine areas, and airspace, as required by section 366(a)(5). As we found in our prior reviews of DOD's sustainable ranges reports, DOD continues to address most of the elements of section 366 which it was required to include in its 2004 comprehensive plan,<sup>5</sup> as well as to develop a training range inventory, and make progress towards incorporating ranges into DOD's readiness reporting system. However, DOD has yet to establish quantifiable goals and trackable milestones in order to measure DOD's progress to mitigate training shortfalls caused by training range limitations, as we recommended in 2004. In addition, while DOD has included some projected funding data required to implement its planned actions, as it was required to do as part of its 2004 comprehensive plan, DOD has not yet included detailed cost estimates as we also recommended previously.

### Range Inventory

Section 366(c) required DOD to develop and maintain a training range inventory for each of the armed services. The inventory was expected to identify (1) all available operational ranges, (2) all training capacities and capabilities available at each training range, and (3) training constraints caused by limitations on the use of military lands, marine areas, and airspace at each training range. According to DOD officials, although the inventory includes all available operational ranges, the report does not provide assessments of the capabilities and constraints for all the ranges in the inventory. However, in response to our 2008 recommendation, DOD's 2009 report now includes an explanation for why some assessments have not been included.<sup>6</sup> For example, in the 2009 report, DOD states that, although the Army does not include an assessment for all of its ranges, the Army ranges included in the report represent 88 percent of its active duty training ranges and also where the majority of encroachment effects are felt. According to DOD, the remaining Army ranges constitute smaller locations and believes that it would have been impractical to include an assessment of every Army training range in the sustainable ranges report due to the large volume of data that would be required to identify all capacities, capabilities, and constraints.<sup>7</sup>

### Readiness Reporting

Section 366(b) also required DOD to report to Congress, not later than June 30, 2003, on its plans to improve its readiness reporting system to reflect the readiness impact that training constraints caused

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<sup>5</sup> Section 366 (a)(4)(C) required the submission of any recommendations for legislative or regulatory changes to address training constraints. While DOD has never submitted such recommendations with its sustainable ranges report, DOD explained in 2007 that it had an alternate mechanism in place for transmitting legislative proposals to Congress that precluded their inclusion in the sustainable ranges report. See GAO-08-10R.

<sup>6</sup> GAO, *Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan*, GAO-09-128R (Washington, D.C.: Dec. 15, 2008).

<sup>7</sup> In providing technical comments on a draft of this report, DOD stated that the Army assesses the capability of its ranges and constraints of its smallest installations through the range modernization process in its yearly programmatic reviews. DOD further stated that the Army chooses not to include those assessments because of the sheer volume and impracticality of compiling that data and providing it in the DOD format required for the sustainable ranges report.

by limitations on the use of military lands, marine areas, and airspace have on specific units of the armed forces.<sup>8</sup> In 2004, we recommended that DOD develop a readiness reporting system to reflect the impact on readiness caused by training constraints. In 2004, DOD disagreed with our recommendation to develop this system, but said that the department planned to incorporate the impact of range encroachment on readiness into the Defense Readiness Reporting System (DRRS).<sup>9</sup> Although DOD has not finalized its plans to incorporate range readiness into DRRS, it has made progress in establishing the framework for this initiative. In the 2009 sustainable ranges report, DOD stated that it began Phase I of the development of a range readiness module for DRRS in October 2008. According to DOD, the module is intended to efficiently support range readiness reporting and provide assessment data for future sustainable ranges reports. Phase I was to develop a prototype using existing range data and was recently completed in May 2009, according to DOD officials. Using lessons from the prototype, DOD began Phase II where the range readiness module will be fully integrated into DRRS. According to DOD officials, Phase II began receiving funding in July 2009 and is also expected to provide the capability to examine the extent to which encroachment factors affect a range's ability to support various operational capabilities. DOD expects Phase II to be completed in April 2010.

### Comprehensive Plan and Annual Progress Reports

Lastly, section 366(a)(1) of the act required DOD to develop a comprehensive plan to address training constraints caused by limitations on the use of military lands, marine areas, and airspace for training of the armed forces in 2004. Section 366(a)(2)-(4) also specified several elements that were to be included in this comprehensive plan, as described above. Further, DOD was required to report annually through fiscal year 2013 indicating progress in implementing that plan. It has taken DOD time to develop a comprehensive plan consistent with the basic requirements of section 366. (For details on our prior recommendations in these areas, see enclosure II.)

### Quantifiable Goals and Milestones

As we have recommended in our prior work, DOD's annual sustainable ranges report could be improved by including quantifiable and measurable goals and milestones in order to track progress. In our assessment of DOD's first report to Congress in 2004, we recommended that DOD develop quantifiable goals and milestones for tracking planned actions and measuring progress.<sup>10</sup> DOD concurred, but stated that accomplishing this would require a long-term approach, and that they planned for future reports to more fully address goals and milestones and projected funding requirements. Although DOD has

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<sup>8</sup> In 2002, DOD Directive 7730.65, *Department of Defense Readiness Reporting System (DRRS)*, established the Defense Readiness Reporting System to measure and report on the readiness of military forces and the supporting infrastructure to meet missions and goals assigned by the Secretary of Defense.

<sup>9</sup> GAO-04-608.

<sup>10</sup> GAO-04-608.

identified broad goals and some milestones in its 2009 report, it has not yet fully implemented our 2004 recommendation to establish quantifiable goals and measurable milestones. Doing so will help DOD and congressional decision makers better track progress to address training shortfalls caused by any lack of or limitations on military range capabilities. As our prior work has shown, without quantifiable goals and time frames associated with achieving milestones, it is difficult to measure and track the extent of progress actually made over time.

### Projected Funding Estimates

We have also reported previously that DOD's annual sustainable ranges report could be improved by identifying DOD's funding requirements needed to accomplish its goals. In our assessment of DOD's first report to Congress in 2004, and as we have consistently stated since that time, we recommended that DOD project funding requirements in order to provide the best information to congressional decision makers on budget trade-offs to address training shortfalls caused by limitations on range resources. While DOD provided 2 years of funding estimates in its 2008 report, we found that the data were not sufficiently detailed, and recommended that DOD provide more descriptive information on those funding categories in the future. In its 2009 report, DOD provided more details for those funding categories, but only provided 1 year of funding data. The 2009 report stated that DOD believes that it is difficult to project funding for range sustainment efforts because funding sources are spread across and embedded within various appropriations—such as operations and maintenance, procurement, or military construction—as well as program elements, which might include manpower, training, real property, or utilities. In addition, DOD stated that each of the services has different command structures and financial processes, which complicate consistent tracking and reporting of these funding data. Nevertheless, DOD also stated in its 2009 report that its Sustainable Ranges Integrated Product Team<sup>11</sup> has examined funding strategies and categorizations used by each of the services for their training range sustainability efforts and developed four categories—modernization and investment, operations and maintenance, environmental, and encroachment—to serve as an initial framework to track, report, and project future range sustainment fiscal needs. Although we believe this is a positive step forward, we reiterate the need for DOD to continue its efforts to identify its sustainable range funding requirements for future years, in accordance with our 2004 recommendation.

### **DOD Has Improved Its Sustainable Ranges Report in 2009 and Additional Revisions Are Under Way for its 2010 Submission**

DOD has taken actions to improve the usefulness of its 2009 sustainable ranges report as a management tool to more precisely identify negative effects to military training capabilities due to range sustainability issues, such as encroachment. DOD officials expect these details to lay the foundation for plans to mitigate those negative effects. DOD also plans to revise its sustainable range goals in 2010 and has already begun to develop the 2010 report, which is scheduled for an early February 2010 release.

### Detailed Support for Capability and Readiness Assessments

According to OSD officials, the most significant change in DOD's 2009 sustainable ranges report submission is the addition of an appendix (Appendix C in the 2009 report) that includes detailed capability and encroachment information provided by the services for each training range they surveyed. OSD officials told us that this detailed information—totaling over 200 pages—forms the basis for the Overall Capability Score and Overall Encroachment Score given to each service in DOD's 2009 report. Although these overall scores were developed and reported in the 2008 sustainable ranges report, 2009 is

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<sup>11</sup> The mission of the Sustainable Ranges Integrated Product Team is to be the DOD coordinating body responsible for oversight, development, and coordination of a comprehensive DOD response to encroachment pressures that adversely affect ranges.

the first year that the report provides the supporting information for each service. For example, range capability information includes specific comments on a range's landscape, airspace, or seaspaces. The services also provided range-specific comments about additional capability attributes such as infrastructure, targets, or threats. Encroachment information in this appendix includes comments such as information about air or water quality, threatened or endangered species' habitats, adjacent land use, and munitions or noise restrictions. In addition, readiness status—indicated as red, yellow, or green—is assigned to each capability and encroachment item and a brief explanation is provided to help explain this status. For example, an airspace range capability is given a red status at one Air Force range because the airspace is too small for refueling training operations. Our review found that the information provided in this new appendix has the potential to enhance the utility of DOD's sustainable ranges report by providing a better understanding of what the individual range constraints are and aiding in developing plans and obtaining the resources required to address any training limitations.

### Special Interest Section

DOD's 2009 sustainable ranges report also includes a new special interest section for each of the military services, which briefly highlights critical issues facing the services regarding range capabilities and encroachment factors. For instance, the Marine Corps section discusses what it considers to be a critical range capability issue in the western Pacific region and Hawaii. The Marine Corps section also describes DOD's expectation that the relocation of units from Okinawa to Guam and the development of training ranges and infrastructure on Guam and selected islands in the area could help alleviate training-related deficits currently being experienced by the Corps in that region. In another example, the Navy notes maritime protective and mitigation measures, regulatory requirements, and court-directed training restrictions for marine mammal protection as critical encroachment factors. According to DOD's report, the Navy believes that these factors contribute to reduced training flexibility and opportunities, segmented training, and ultimately reduced training realism, particularly with respect to integrated warfare training. The special interest section also includes other general issues relevant to the report. For example, the Army used this section of the 2009 report to discuss the impact of 2005 Base Realignment and Closure actions on Army training land requirements. By highlighting its most pressing range sustainability issues, DOD officials expect to be able to begin to prioritize the department's actions to address range issues in the most efficient and effective manner.

### Addressing GAO's 2008 Recommendations

DOD's 2009 report also includes a section that specifically addresses four recommendations that we made in 2008.<sup>12</sup> In that report, we recommended that (1) DOD's report should include an explanation for why any ranges are excluded from its assessment, (2) the Air Force should update its actions taken regarding the modernization and investment goal, (3) DOD should include additional information to better explain what is included in each of the four funding categories that DOD uses for training range sustainment, and (4) the Marine Corps should modify its reports on training range capability to be consistent with the other services. DOD agreed with the first three recommendations, and took steps to address them in its 2009 report. Furthermore, even though DOD did not originally concur with the fourth recommendation, in providing technical comments on a draft of this report, DOD stated that the Marine Corps is considering how best to provide assessments in the future which will include greater detail in response to an increased emphasis on developing consistent measures for DOD readiness reports, which

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<sup>12</sup> GAO-09-128R.



was the point of our 2008 recommendation. Enclosure II provides information on these and all of our recommendations developed during our five previous reviews on this subject.

### DOD's Plans for the 2010 Report

OSD officials told us that DOD's 2010 report will include new goals and is on track for a February 2010 release. OSD issued a memorandum in June 2009 requesting input from the services for its 2010 report. According to that memorandum, DOD plans to introduce what officials refer to as "revolutionary changes" in the department's 2010 report by revamping its goals. Currently the report focuses on four critical range sustainment areas—Modernization and Investment, Operations and Maintenance, Environmental, and Encroachment. According to OSD officials, these areas will be replaced in the 2010 report for assessment purposes with the following seven focus areas: (1) mitigate competing land and seaspace uses; (2) address frequency spectrum competition; (3) meet military airspace challenges; (4) manage increasing military demand for range space; (5) address energy infrastructure impacts; (6) anticipate climate change initiatives; and (7) prepare for increased environmental emphasis. The four critical range sustainment areas will continue to be used for describing funding requirements for the ranges. In its June 2009 memorandum, OSD requested service input by August 31, 2009. Although OSD has granted some extensions for some of the services' input, these officials told us that they still anticipate a February 2010 issuance for the 2010 report on sustainable ranges.

### **Agency Comments**

In written comments on a draft of this report, the Deputy Under Secretary of Defense (Readiness) agreed with our report findings. These comments are reprinted in their entirety in enclosure III. DOD also provided technical comments which we have included in our report where appropriate.

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We are sending copies of this report to the Secretary of Defense; the Secretaries of the Army, the Navy, and the Air Force; the Commandant of the Marine Corps; the Director, Office of Management and Budget, and interested congressional committees. In addition, this report will be available at no charge on our Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-4523 or [leporeb@gao.gov](mailto:leporeb@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report include James Reifsnyder, Assistant Director; Karen Kemper; Robert Poetta; Jena Whitley; Susan Ditto; Michael Willems; and Kate Lenane.



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**Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003, as amended<sup>13</sup>**

SEC. 366. Training Range Sustainment Plan, Global Status of Resources and Training System, and Training Range Inventory.

(a) PLAN REQUIRED—(1) The Secretary of Defense shall develop a comprehensive plan for using existing authorities available to the Secretary of Defense and the Secretaries of the military departments to address training constraints caused by limitations on the use of military lands, marine areas, and airspace that are available in the United States and overseas for training of the Armed Forces.

(2) As part of the preparation of the plan, the Secretary of Defense shall conduct the following:

(A) An assessment of current and future training range requirements of the Armed Forces.

(B) An evaluation of the adequacy of current Department of Defense resources (including virtual and constructive training assets as well as military lands, marine areas, and airspace available in the United States and overseas) to meet those current and future training range requirements.

(3) The plan shall include the following:

(A) Proposals to enhance training range capabilities and address any shortfalls in current Department of Defense resources identified pursuant to the assessment and evaluation conducted under paragraph (2).

(B) Goals and milestones for tracking planned actions and measuring progress.

(C) Projected funding requirements for implementing planned actions.

(D) Designation of an office in the Office of the Secretary of Defense and in each of the military departments that will have lead responsibility for overseeing implementation of the plan.

(4) At the same time as the President submits to Congress the budget for fiscal year 2004, the Secretary of Defense shall submit to Congress a report describing the progress made in implementing this subsection, including—

(A) the plan developed under paragraph (1);

(B) the results of the assessment and evaluation conducted under paragraph (2); and

(C) any recommendations that the Secretary may have for legislative or regulatory changes to address training constraints identified pursuant to this section.

(5) At the same time as the President submits to Congress the budget for each of fiscal years 2005 through 2013, the Secretary shall submit to Congress a report describing the progress made in

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<sup>13</sup> Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 was amended by Pub. L. No. 109-364, § 348 (2006); and Pub. L. No. 110-181, § 1063(c)(2) (2008).

implementing the plan and any additional actions taken, or to be taken, to address training constraints caused by limitations on the use of military lands, marine areas, and airspace.

(b) **READINESS REPORTING IMPROVEMENT**—Not later than June 30, 2003, the Secretary of Defense, using existing measures within the authority of the Secretary, shall submit to Congress a report on the plans of the Department of Defense to improve the Global Status of Resources and Training System to reflect the readiness impact that training constraints caused by limitations on the use of military lands, marine areas, and airspace have on specific units of the Armed Forces.

(c) **TRAINING RANGE INVENTORY**— (1) The Secretary of Defense shall develop and maintain a training range inventory for each of the Armed Forces—

(A) to identify all available operational training ranges;

(B) to identify all training capacities and capabilities available at each training range; and

(C) to identify training constraints caused by limitations on the use of military lands, marine areas, and airspace at each training range.

(2) The Secretary of Defense shall submit an initial inventory to Congress at the same time as the President submits the budget for fiscal year 2004 and shall submit an updated inventory to Congress at the same time as the President submits the budget for fiscal years 2005 through 2013.

(d) **GAO EVALUATION**—The Secretary of Defense shall transmit copies of each report required by subsections (a) and (b) to the Comptroller General. Within 90 days after receiving a report, the Comptroller General shall submit to Congress an evaluation of the report.

(e) **ARMED FORCES DEFINED** — In this section, the term “Armed Forces” means the Army, Navy, Air Force and Marine Corps.

## Enclosure II

### List of Prior GAO Reviews and Recommendations, and DOD Action to Date

**GAO-09-128R: *Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan* (December 15, 2008)**

GAO recommendation	Original DOD response	DOD actions
Include each service's rationale for excluding the specific training ranges not included in its assessment of the adequacy of current resources to meet requirements in future sustainable ranges reports.	<b>Concur.</b> Future reports will incorporate rationale as to why some ranges may be included in the inventory, yet not have a capability or encroachment assessment performed.	Rationale for excluding some Army and Marine Corps range assessments was added to the 2009 Sustainable Ranges Report.
Include the Marine Corps' individual combat training elements as the mission areas in the range capability and encroachment assessment in future sustainable ranges reports.	<b>Did not concur.</b> The Marine Corps' approach to assessing range capability and encroachment is consistent with all the source documents and methodologies by which the Marine Corps manages and resources its ranges. The capabilities assessments are designed to measure the ranges' ability to support the levels of training on the Marine Corps training continuum. Those levels of training are all based on established training responsibilities embodied in Marine Corps Tasks. In future reports, they will provide greater explanatory comments on both capabilities and encroachment impacts, but the framework established in their Required Range Capabilities Document, range complex management plans, and range management orders all support the methodology they have employed in this report.	No changes have been made to the Marine Corps' mission areas. However, according to DOD, greater explanatory comments on impacts to training are provided in the Special Interest section of Chapter 3 and Appendix C of the 2009 Sustainable Ranges Report for all services. According to DOD officials, the Marine Corps is considering how best to provide future assessments to include greater detail in response to an increased emphasis on developing consistent measures for DOD readiness reporting.

## Enclosure II

GAO recommendation	Original DOD response	DOD actions
Update on the actions taken by the Air Force to address DOD's modernization and investment goals for range sustainment in future sustainable ranges reports.	<b>Concur.</b> Updates of actions taken by each Service over the proceeding year towards completion of goals and milestones will be addressed.	According to DOD and Air Force officials, the Air Force's updated submission was prepared but not included in the final 2009 Sustainable Ranges Report due to an administrative oversight. DOD officials told us that this will be rectified in the 2010 report submission.
Include a detailed description of all funding data included in each funding category, for each of the military services in future sustainable ranges reports.	<b>Concur.</b> The Office of the Secretary of Defense will work with the Services to provide a more detailed description of what areas are financed within each of the funding categories.	DOD included table 4.7 in the 2009 Sustainable Ranges Report which provides specific examples for each of the four funding categories.
<b>GAO-08-10R: <i>Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan</i> (October 11, 2007)</b>		
Develop clear criteria and standard methods for assessing current and future training range requirements and capabilities.	<b>Concur.</b> Will continue to develop and improve the criteria and methodology associated with our range requirements and capabilities assessment processes in our subsequent reports.	DOD established standardized criteria and identified common factors to assess range capabilities and encroachment in the 2008 Sustainable Ranges Report.
Include funding information on the services' range sustainment efforts in funding reports.	<b>Concur.</b> Programming funding data associated with range sustainment will be captured and documented in future Sustainable Ranges Reports to Congress to the extent possible. However, any funding data presented beyond the current year will be subject to a caveat that final Service budgets for out years are subject to change.	Although DOD has taken steps to examine funding categories and strategies across each of the services, it has not yet provided a consistent assessment of future funding requirements.
<b>GAO-06-725R: <i>Improvement Continues in DOD's Reporting on Sustainable Ranges but Additional Time Is Needed to Fully Implement Key Initiatives</i> (June 20, 2006)</b>		
Because our previous recommendations remained open, we did not recommend any new executive actions in this report.	N/A	N/A

Enclosure II

**GAO-06-29R: Some Improvements Have Been Made in DOD's Annual Training Range Reporting but It Still Fails to Fully Address Congressional Requirements (Oct. 25, 2005)**

GAO recommendation	Original DOD response	DOD actions
Because our prior recommendations for improving the Office of the Secretary of Defense's annual training range reporting remained open, valid, and not fully addressed, we did not make new recommendations in this report.	N/A	N/A

**GAO-04-608: MILITARY TRAINING: DOD Report on Training Ranges Does Not Fully Address Congressional Reporting Requirements (June 4, 2004)**

Develop an integrated training range database that identifies available training resources, specific capacities and capabilities, and training constraints caused by limitations on the use of training ranges, which could be continuously updated and shared among the Services at all command levels, regardless of Service ownership.	<p><b>Did not concur.</b> Each military service already processes and is improving range information systems that address the features described in this recommendation. Further, the Department agrees that, as a long-term goal these systems should be linked to support joint use. It is DOD policy to document encroachment concerns and environmental considerations and improve information systems related to range management. The services and the Office of the Secretary of Defense are moving forward in a deliberate approach that builds on existing systems and carefully manages the costs and risks inherent in information system integration and development. As part of our yearly Section 366 reports, the Department will document progress in this evolutionary effort to link and improve the Service range information systems.</p> <p>However, the department non-concurs with the recommendation ... It must be recognized that each Service operates ranges to meet specific training requirements. While increased cross-Service or cross-functional use is a DOD goal, it does not resolve training constraints brought about by encroachment.</p>	Although DOD continues to non-concur with this recommendation to develop a stand alone training range database, DOD is developing a range module to be included in the Defense Readiness Reporting System which will provide an integrated database that identifies available training resources and constraints.
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## Enclosure II

GAO recommendation	Original DOD response	DOD actions
<p>Develop a comprehensive plan, which includes quantifiable goals and milestones for tracking planned actions and measuring progress, and projected funding requirements to more fully address identified training constraints.</p>	<p><b>Concur.</b> Meeting section 366 requirements can be accomplished only through a long-term approach. Under the Office of the Secretary of Defense leadership, each of the Military Services has initiated an enhanced range management and comprehensive planning process, as an integral element of expanding range sustainability programs. In line with this evolution, future reports will more fully address goals and milestones and project funding requirements associated with these comprehensive plans. The department is and will continue to execute a comprehensive program to improve sustainability of its ranges, and disagrees with the implication in this recommendation that it does not.</p>	<p>Chapter 4 of the 2009 Sustainable Ranges Report discusses DOD's comprehensive training range sustainment plan. Although DOD has identified broad goals and some milestones in its 2009 report, DOD has not developed quantifiable goals and measurable milestones so that it and congressional decision makers can better track progress to address training shortfalls caused by any lack of or limitations on military range capabilities. DOD has taken some steps to report funding requirements but more needs to be done.</p>
<p>Assess current and future training range requirements and evaluate the adequacy of current resources to meet these requirements.</p>	<p><b>Did not concur.</b> The Department has begun a program to better define range requirements. Because a valid requirements base must be a bottom-up process, this effort entails detailed work at each installation. It is unclear why GAO chose to not examine these efforts. Also, it is both impractical and inappropriate to include this level of detail in an OSD-level report. DOD believes that the Congress is better served if the Department describes, summarizes, and analyzes training requirements in its Section 366 report, rather than simply providing the requirements themselves.</p>	<p>Although DOD has taken steps to examine funding categories and strategies across each of the services, it has not provided a consistent assessment of future funding requirements.</p>



## Enclosure II

GAO recommendation	Original DOD response	DOD actions
<p>Develop a readiness reporting system to reflect the impact on readiness caused by training constraints due to limitations on the use of training ranges.</p>	<p><b>Did not concur.</b> The Department has, in its response to GAO's previous report and at other opportunities, stated that it is inappropriate to modify the Global Status of Resources Training System report to address encroachment. DOD believes it is best to assess how encroachment impacts affect the ability of installations and ranges to conduct training and testing. DOD plans to incorporate encroachment impacts on readiness into the Defense Readiness Reporting System (DRRS), which is currently under development.</p>	<p>The Office of the Secretary of Defense completed Phase 1 of the pilot project in May 2009 to develop an operational prototype range module for DRRS using existing service range data, and develop methods to incorporate them into DRRS. Phase 2 is funded and work has begun to incorporate the module. Phase 2 is expected to provide the capability to examine the extent to which encroachment factors affect a range's ability to support various operational capabilities, and is expected to be completed by April 2010.</p>

Sources: GAO and DOD.

Enclosure III

**Comments from the Department of Defense**



PERSONNEL AND  
READINESS

OFFICE OF THE UNDER SECRETARY OF DEFENSE  
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OCT 19 2009

Mr. Brian J. Lepore  
Director, Defense Capabilities and Management  
U.S. Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20548

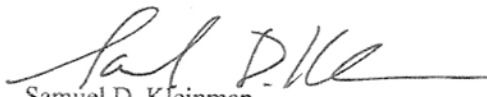
Dear Mr. Lepore:

This is the Department of Defense (DoD) response to the Government Accountability Office Draft Report GAO-10-103R, "MILITARY TRAINING: DOD's Report on the Sustainability of Training Ranges Addresses Most of the Congressional Reporting Requirements and Continues to Improve with Each Annual Update," dated October 5, 2009 (GAO Code 351372).

Thank you for the opportunity to comment on this draft. The DoD appreciates the GAO's assessment of the Department's comprehensive plan to address encroachment challenges facing our nation's military ranges and operating areas and to sustain these critical assets. As the GAO observes, we believe that over the years significant progress has been made in addressing the elements of the Congressional requirement. The Department agrees in general with the report and has no specific comments.

We appreciate the collegial relationship fostered by the GAO over the years in addressing this ongoing requirement and look forward to continuing to work with Congress and the GAO to maintain a ready and sustainable military testing and training infrastructure.

Sincerely,

  
Samuel D. Kleinman  
Deputy Under Secretary of Defense  
(Readiness)

## Related GAO Products

*Military Training: Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan.* GAO-09-128R. Washington, D.C.: December 15, 2008.

*Military Training: Compliance with Environmental Laws Affects Some Training Activities, but DOD Has Not Made a Sound Business Case for Additional Environmental Exemptions.* GAO-08-407. Washington, D.C.: March 7, 2008.

*Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan.* GAO-08-10R. Washington, D.C.: October 11, 2007.

*Improvement Continues in DOD's Reporting on Sustainable Ranges, but Additional Time Is Needed to Fully Implement Key Initiatives.* GAO-06-725R. Washington, D.C.: June 20, 2006.

*Military Training: Funding Requests for Joint Urban Operations Training and Facilities Should Be Based on Sound Strategy and Requirements.* GAO-06-193. Washington, D.C.: December 8, 2005.

*Some Improvements Have Been Made in DOD's Annual Training Range Reporting but It Still Fails to Fully Address Congressional Requirements.* GAO-06-29R. Washington, D.C.: October 25, 2005.

*Military Training: Actions Needed to Enhance DOD's Program to Transform Joint Training.* GAO-05-548. Washington, D.C.: June 21, 2005.

*Military Training: Better Planning and Funding Priority Needed to Improve Conditions of Military Training Ranges.* GAO-05-534. Washington, D.C.: June 10, 2005.

*Military Training: DOD Report on Training Ranges Does Not Fully Address Congressional Reporting Requirements.* GAO-04-608. Washington, D.C.: June 4, 2004.

*Military Training: Implementation Strategy Needed to Increase Interagency Management for Endangered Species Affecting Training Ranges.* GAO-03-976. Washington, D.C.: September 29, 2003.

*Military Training: DOD Approach to Managing Encroachment on Training Ranges Still Evolving.* GAO-03-621T. Washington, D.C.: April 2, 2003.

*Military Training: DOD Lacks a Comprehensive Plan to Manage Encroachment on Training Ranges.* GAO-02-614. Washington, D.C.: June 11, 2002.

*Military Training: DOD Needs a Comprehensive Plan to Manage Encroachment on Training Ranges.* GAO-02-727T. Washington, D.C.: May 16, 2002.

*Military Training: Limitations Exist Overseas but Are Not Reflected in Readiness Reporting.* GAO-02-525. Washington, D.C.: April 30, 2002.

(351372)

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